

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
IP-Enabled Services	)	WC Docket No. 04-36
	)	
E911 Requirements for IP-Enabled Service Providers	)	WC Docket No. 05-196
	)	

**COMMENTS  
OF THE  
NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION**

The National Telecommunications Cooperative Association (NTCA)<sup>1</sup> submits these comments in response to the Federal Communications Commission's (Commission's or FCC's) *Public Notice* in the above-referenced proceeding.<sup>2</sup>

In its NPRM, the Commission seeks comment on what additional steps the Commission should take to ensure that providers of VoIP services that interconnect with the nation's PSTN provide ubiquitous and reliable E911 service. NTCA's members are rural, community-based telecommunications providers. They fully support the Commission's efforts to ensure that the public safety is protected as consumers take advantage of new and exciting technologies. As

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<sup>1</sup> NTCA is the premier industry association representing rural telecommunications providers. Established in 1954 by eight rural telephone companies, today NTCA represents more than 560 rural rate-of-return regulated telecommunications providers. All of NTCA's members are full service incumbent local exchange carriers (ILECs) and many of its members provide wireless, cable, Internet, satellite and long distance services to their communities. Each member is a "rural telephone company" as defined in the Communications Act of 1934, as amended (Act). NTCA's members are dedicated to providing competitive modern telecommunications services and ensuring the economic future of their rural communities.

<sup>2</sup> *In the Matter of IP-Enabled Services*, WC Docket No. 04-36, *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, First Report and Order and Notice of Proposed Rulemaking (rel. June 3, 2005) (NPRM).

such, NTCA's members are fully committed to working with the VoIP providers and the Commission to work through any implementation difficulties.

It is important that all parties recognize that there are technical and operational differences between the large Regional Bell Holding Companies (RBOCs) and the small ILECs. As the Commission correctly recognizes, "911 service features, and the ability of PSAPs to make use of them, vary from location to location and network to network."<sup>3</sup> The VoIP providers must similarly recognize the differences between networks and take appropriate steps to work with the small carriers in a timely fashion. While some degree of standardization may be realizable, each rural network is unique; configurations vary as do the combinations of vendors used to provision each rural network. Unanticipated interoperability problems are a possibility. VoIP providers should expect to deal with each rural provider on a case-by-case basis.

NTCA encourages the VoIP providers to approach the rural carriers with whom they choose to assist them in meeting the Commission's VoIP E911 requirements early in the process. The process may take some time as the parties work through any technical glitches. It may be difficult to achieve implementation goals and meet deadlines if the VoIP providers wait until the 11<sup>th</sup> hour to work with the independent carriers. All affected carriers must be involved as soon as is reasonably practical.

In its NPRM the Commission questions what E911 obligations, if any, should apply to VoIP services that are not fully interconnected to the public switched telecommunications network (PSTN).<sup>4</sup> Specifically the Commission asks whether E911 obligations should apply to VoIP services that enable users to terminate calls to the PSTN but do not permit users to receive

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<sup>3</sup> NPRM, ¶ 11.

<sup>4</sup> NPRM, ¶ 58.

calls that originate on the PSTN. It is NTCA's belief that the issue should be examined from the perspective of the consumer. If the consumer would expect that a 911 call placed from his or her choice of service would be treated as any other 911 call, that expectation should be met. A misunderstanding on the part of consumers about the limitations of services may have deadly consequences. It is reasonable for consumers who are accustomed to placing calls to the PSTN to assume that 911 calls would be treated the same as a 911 call made using another service provider. From the consumers' perspective there is virtually no difference between using the VoIP service to place calls and using a traditional service to place calls, even though that same consumer may not have the ability to receive PSTN-generated communications. VoIP providers who enable their subscribers to terminate calls to the PSTN should comply with the E911 requirements, even if their users cannot receive calls that originate on the PSTN.

The Commission also questions whether it should require VoIP service providers to create redundant systems for providing E911 services, such as requiring redundant trunks to each Selective Router and/or requiring that multiple Selective Routers be able to route calls to each PSAP.<sup>5</sup> It is NTCA's position that redundancy in a public safety system is a worthwhile objective. The public is better protected from unforeseen technical difficulties. However, NTCA believes that it is premature at this time to adopt regulations requiring redundancy. It is most important that carriers work together to create a fully functional, ubiquitous E911 system and see what issues develop. It may well be that redundancy in the systems are appropriate, but it is too soon to determine whether they are necessary or whether the benefit justifies the cost.

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<sup>5</sup> NPRM, ¶ 59.

Rather than adopting redundancy requirements, the Commission should commit itself to reexamining this issue in the near future.

Respectfully submitted,

NATIONAL TELECOMMUNICATIONS  
COOPERATIVE ASSOCIATION

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## CERTIFICATE OF SERVICE

I, Gail Malloy, certify that a copy of the foregoing Comments of the National Telecommunications Cooperative Association in WC Docket No. 04-36, WC Docket No. 05-196, FCC 05-116 was served on this 15th day of August 2005 by electronic mail to the following persons.

/s/ Gail Malloy

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